

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Thomas Vanaskie  
(Ret.),  
Special Discovery Master

**STATEMENT OF NO BRIEF PURSUANT LOCAL RULE 7.1(d)(4)**

Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Prinston Pharmaceutical Inc. (“Prinston”), Huahai U.S. Inc. (“Huahai U.S.”), and Solco Healthcare U.S. LLC (“Solco”, and collectively with ZHP and Prinston, “the ZHP Parties”), by and through their undersigned counsel, Duane Morris LLP, hereby submit, pursuant to Local Civil Rule 7.1(d)(4), that no brief in support of their Motion to Seal Exhibits 4-10 and 14-16 of Plaintiffs’ Motion to Compel (ECF No. [1405](#)) Pursuant to Local Civil Rule 5.3(c) is necessary for the reasons set forth in Local Rule 5.3(c)(1), governing motions to seal.

Respectfully submitted,

DUANE MORRIS LLP

/s/ Kelly A. Bonner

Dated: October 12, 2021